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BUREAU OF WATER PROTECTION & LAND REUSE
OFFICE OF THE BUREAU CHIEF

February 2, 2010

FEB 04 2010

Mr. Paul E. Stacey
Director
Bureau of Water Protection & Land Reuse
Planning & Standards Division
Department of Environmental Protection
79 Elm Street
Hartford, CT 06106-5127

Re: **CT DEP Proposed Stream Flow Standards and Regulations**

Dear Mr. Stacey:

Connecticut Farm Bureau Association is a private non-profit association representing over 5,000 member families. Connecticut Farm Bureau members are engaged in all aspects of agricultural production including, but not limited to: livestock and poultry production, vegetables, fruits, nurseries and greenhouses, dairy and feed. All of these agricultural enterprises could not exist without sustainable access to the lifeblood of farming, water.

While the Connecticut Farm Bureau supports the fundamental need to maintain viable aquatic life in Connecticut's rivers and streams, we have serious concerns over the impact these proposed regulations will have on Connecticut farmers and the process that CT DEP utilized to finalize these proposed regulations.

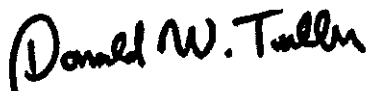
The CT DEP estimates that agricultural production currently accounts for 22% of all water used in Connecticut. Unlike other users of water, the majority of water used in agricultural production is recycled back into the hydrologic cycle. Historically, farmers have always had access to water to maintain their crops and livestock and have implemented best management practices to conserve this valuable resource. The consumptive use of water by an individual farmer is often variable, seasonal and difficult to predict. This is especially true for field grown crops and livestock. This point becomes especially crucial during low flow periods or emergency drought situations when the need for access to water by Connecticut farmers is critical to the immediate survival of crops and livestock.

Connecticut Farm Bureau would like to take this opportunity to present recommendations to the CT DEP to address the concerns of Connecticut agriculture:

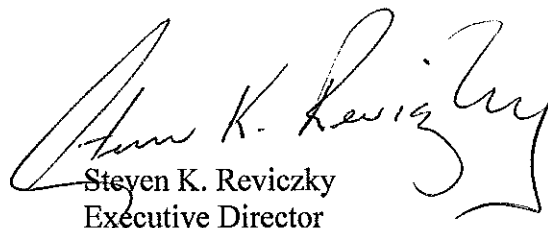
- 1) There are twenty exemptions in the proposed regulations. Agriculture, as defined by CGS 1-1(q), should also be included as an exempt activity.
- 2) Reconvene the members of the Commissioner's Advisory Group to complete the policy and implementation portion of the regulations and redraft the regulations to address the comments heard during the public hearing process. The Commissioner's Advisory Group should then be provided an opportunity to comment on the redraft.
- 3) Assure that agriculture, as defined by CGS 1-1(q), is guaranteed access to water during low flow and emergency drought situations.
- 4) Complete the classification of rivers and streams first and then develop regulations to address identified concerns once classifications are completed. This will allow the CT DEP to focus on where the stream flow problems lie during periods of low flow and draft remedial regulations accordingly.

Connecticut Farm Bureau Association welcomes the opportunity to continue to work with the CT DEP to adopt regulations to protect the future of Connecticut agriculture.

Respectfully submitted,



Donald W. Tuller
President



Steven K. Reviczky
Executive Director